

# **MTAC Workgroup 170 – Certificate of Mailing Final Workgroup Meeting**

**December 2, 2015**

- Target Publication Date: Thursday, December 24, 2015
- Highlights of Information:
  1. June 2, 2017 Form Compliance Date
  2. Central Approval of Facsimile to HQ
  3. Clarification on Format for “Nearly Identical”
  4. Sequential Page Numbering (Page \_ of \_)

**Long Term Recommendation -  
COM Form Changes**



**Long Term Recommendation -  
General**



**Certificate of Mailing - Firm  
Automated Recommendation**



**Certificate of Mailing – Bulk  
Automated Recommendation**



**MTAC 170 COM Close-out**



# Long Term Recommendation – COM Form Changes

- 1. Mailers are asking not to change their facsimile forms and will pay the Regular COM Rate.**

**USPS Response:** The USPS will allow until **June 2, 2017** for mailers to convert to the USPS COM forms (based on the close-out date of MTAC Workgroup 170 on December 2, 2015).

- 2. Mailers request a description of what would happen if changes are mandated but not made.**

**USPS Response:** There will be no change to existing mailer compliance on mailing standards. Mailers must be in compliance with the new Form in order to receive the service on the effective date indicated in the final DMM language.

**3. Mailers would have 18 months from the release date of the USPS tool to either change their forms or utilize the USPS Tool (use of the Automation Subgroup Recommendation would remain optional)."**

- Minimum requirement is to update the form number and product names. This includes changes to put the appropriate information with the corresponding form number.**
- No barcode required.**

**USPS Response:** The USPS will allow an 18 month transition period (**June 2, 2017**) to convert to the USPS COM forms from December 2, 2015 the official close-out date for the MTAC 170 Workgroup. Mailers must be in compliance with the new Form in order to receive the service on the effective date indicated in the final DMM language.

A barcode on the form and on the pieces appended to the form would be considered a requirement if the Automation option and COM Tool are adopted.

If the COM Tool is developed, it would include the required barcode on the form and allow mailers to upload the encrypted files with the barcodes for the pieces appended.

### 4. Facsimile forms approved at the National Level

**USPS Response:** The USPS proposes to revise mailing standards to approve the COM forms that are nearly identical to the USPS Form at the Headquarters level. Proposed effective date: January 17, 2016 to align with the expected DMM publishing date for the Competitive Price Change.

Submit request for form facsimile approval to: **COM\_FACSIMILE@USPS.GOV**

### 5. USPS will send copies w/ approval to designated local Postmaster(s)

**USPS Response:** Yes, as part of the COM Facsimile Approval process mentioned above in item 4., USPS proposes to provide a copy of the final approval to the Postmaster(s) for the office(s) and/or district manager, Business Mail Entry, of acceptance. The copy of the form will include a watermark. USPS is not required to maintain a copy of the forms.

Mailer will be responsible for providing postal contact information for the acceptance office (i.e. Post Office, BME or DMU).

**6. DMM update allowing for either the stamp of summary page only or for the stamping of individual pages of COM forms**

**USPS Response:** The USPS will not support changing standards to eliminate the postmarking of each page of the Certificate of Mailing-Firm forms as required for the service.

**7. USPS would create two pricing tiers for COM (Firm) (requires PRC approval)**

**USPS Response:** Since we cannot dictate prices, we will take the “two pricing tiers for COM-Firm” under future consideration.



# Long Term Recommendation – General

- 8. All COM forms, regardless of how they are produced, will have a date stamp (“Round Stamp”)**  
–This stamp can be a manual stamp or an electronically applied Stamp.

**USPS Response:** Yes, all COM forms including USPS-approved mailer facsimiles will have a postmark (date-stamp) on each page regardless if a mailer uses a summary sheet or not. The USPS proposes to include the ability to generate an electronically applied postmark to the two domestic COM forms in the COM Tool, if developed (and as mentioned further below, under the Automated Option).

- 9. USPS allows three business days to correct mistakes, stamp page missed.**

**USPS Response:** The USPS has conceded to permit a grace period of three business days for mailers to present COM forms for review by USPS when a page was not properly postmarked. It will be at the sole discretion of the USPS to determine if the missed page was a USPS error and if it can/will be postmarked the next business day. It will be the Postmaster, Manager or their designee’s responsibility to postmark the missing pages.

# **Certificate of Mailing - Firm Automated Recommendation**

**10. USPS Legal will work with Industry Legal to update state courts on COM changes to ensure acceptance of new forms/process.**

**USPS Response:** USPS believes that our existing methods used to notify the public of changes to our products and services should not be changed and provides sufficient information for the Industry and/or their Legal counsel to update the state courts on any USPS product and service changes.

**11. Counter proposals from the USPS will be provided in writing and Workgroup #170 will meet to review and provide feedback.**

**USPS Response:** USPS provided did provide a written response to the MTAC 170 recommendations by September 21, 2015, then for clarifications purposes:

- USPS resubmitted a clarified report on October 7, 2015
- provided subsequent email updates
- held two webinars to review the Automation Option and to receive group feedback
- and the final MTAC 170 is being conducted today (December 2, 2015)

**12. MTAC Workgroup #170 will review USPS Tool requirements and design prior to the start development.**

**USPS Response:** If any changes occur to the COM Tool concept and the tool is approved for development, USPS will provide an overview of the planned development within 6 months from December 2 (i.e. June 2, 2016). As previously stated, if appropriate and time allows during the development process the design of the tool will be shared to the extent practical.

### **13. Up front user requirements for Firm Mailings**

#### **–Piece**

- **Unique ID required on each piece**
- **Uniqueness definition same as full service**

#### **–Class, MID, Sequence #**

**–Unique ID will be printed in human readable form on the piece and be visible through the envelope window**

**–Routing ZIP Code is not part of the unique piece ID**

**USPS Response:** USPS agrees that the unique piece ID can omit the routing ZIP Code when uploaded into the COM Tool, if developed.

However, for the “Automated” COM-Firm, this unique piece ID will also service as the confirmation number for the COM request and the unique ID (must remain unique for not less than 45 days) and will be mapped to the final IMb on the mailpiece.

## **14. Mail Owner will upload an encrypted files manually via the Gateway or automatically via FTP:**

### **•Format TBD:**

- Name(s) exactly as printed on mail piece (optional);**
- Full Address;**
- Unique ID number (could be policy number or blank);**
- Piece unique id=»Mail class; »MID on piece; »Serial number on piece;**
- Approver name;**
- Payment method and needed information;**
- IMPb (if blank, USPS generates);**

### **•Not qualification eDoc submission**

### **•USPS assigns unique COM IMPb to each upload and allows mail owner to print cover page with IMPb;**

- Mail owner could create cover page by including the IMPb in the file**

**USPS Response:** The COM Tool via the Gateway would allow the uploaded format to be Shipping Services File (SSF), mail.xml, mail.dat, or csv., (comma separated value-flat files). The proposed COM Tool would create the IMPb for the COM Forms and transmit it to PostalOne! (PO!) which will include the names, addresses, etc. for Automated Option.

- Acceptance site would complete sampling/scanning (not Performance Based Verification) of the mailing which would be reconciled in PO! for Automated Option.
- PO! will collect payment of fees through Permit/CAPS for Automated Option.
- PO! will transmit completed COM Form/data back to COM Tool and the COM Tool will generate the form with an electronic postmark/USPS employee initials for Automated Option.
- COM Tool will allow mailer to then print form and/or save to .pdf for Automated Option.
- COM Tool will retain the data for 180 day period to align with current PO! system retention for mailings for Automated Option (or manual option).

**15. Audit of content By USPS Representative:**

- Either at Mail Owner or MSP location at same time in the process as today;
- Scan/Enter mail owner provided IMPb to bring up related “COM PS 3665 Auto” data;
- Scan IMb on piece with hand held scanner or manually enter unique piece ID literal as shown in address window
- Piece information will display on computer:
  - Verify name, Address, unique ID #, IMb on piece match display;
  - Select pass or fail sampling on computer for each piece
- Continue for all samples:
  - If commingled, clerk enters piece count from sorter run;
  - When audit is complete, Clerk electronically signs acknowledgement form on computer
- PO! Automatically sends PDF to mail owner:
  - Full 3665;
  - Contains Name, address, unique ID #, and IMb for each piece;
  - Each page has an electronic round stamp, electronic USPS signature and mail owner approver name;
  - Sent immediately after clerk marks audit complete;
  - Error tolerances the same as today.

**USPS Response:** Since COM-Firm is to validate that the individual pieces were presented for mailing, there are no error tolerances today for missing Certificate of Mailing pieces. The mailing should be returned to the mailer for correction. Under the Automated Option, the USPS proposes that if a sample piece is scanned by the employee, and it is not reported on the form or it was reported on the form but could not be located in the mailing, the COM Tool will include an error/rejected report. The subsequent electronically postmarked COM Form generated by the COM Tool will not include the missing pieces for Automated Option. PO! would not process fee payment for any pieces listed on the error/rejected report for Automated Option. Pieces on reject report will be given back to mailer to be included in a subsequent mailing for Automated Option.



## **16. Hard copy reporting at time of mailing**

**–Single front page of PS Form 3665 for clerk to scan IMPb**

**USPS Response:** If the COM Tool is created, USPS proposes that the COM Tool will either generate the barcoded Form and all pages for printing in hardcopy (for manual option), a single page with a confirmation number for an “Automated” option for the mailer to scan to link to their eDoc, or the confirmation number could be used in lieu of single page of the Form 3665 for data being transmitted from the COM Tool to PO!. This will eliminate the manual steps under a proposed “Automated” environment. The confirmation number would be used at the time of mailing to obtain the Form and data in PO!, similar to electronic Postage Statement Wizard today.

## **17. COM Fee Payment (excludes postage)**

**–Payment can come from the mail owner’s CAPS account at time of Name & Address upload or**  
**–Meter Strip**  
**–Clerk will verify payment at time of audit**

**USPS Response:** In order to implement the “Automated” process, payment must be made through the mailer’s Permit/CAPS account through PO! once the clerk verifies the mailing and the postage statement is finalized, instead of by meter strips.

**Note:** Meter strips would only be used by mailers that print the hardcopy version from the COM Tool under the ‘manual’ option).

## **18. Initial page with meter strips is retained by the mail owner**

**USPS Response:** Also see response above to #17.- we cannot move to an “Automated” option/process and to an electronic postmark if meter strips are still manually affixed to the Firm sheets.

**Note:** Meter strips would only be permitted for use by mailers that print the hardcopy version from the COM Tool and have the postage affixed to the form under the **‘manual’ option**.

## **19. Reversals will follow existing USPS process**

**USPS Response:** There is no reversal process for COM once the service has been provided. USPS proposes to include a feature in the COM Tool, if developed, to allow the mailer to ‘cancel’ a Form request provided the acceptance site has not begun the verification/scanning process for Automated Option.

## **20. Pricing**

- Auto COM has reduced rate**
- Tiered pricing based on volume?**

**USPS Response:** Since we cannot dictate prices, we will take the “tiered pricing based on volumes” under future consideration. USPS currently offers only Negotiated Service Agreements routinely based on volumes that do not already provide work-share incentives.

## **21. Mail.dat & XML have no special COM requirements**

**USPS Response:** Mailers using Mail.dat/MailXML will include unique Grouped Extra Service Type populated with F-Firm and Grouped Extra Service Barcode populated with the COM Identifier/IMpb from the COM Tool's form.

# **Additional Statements from MTAC Workgroup #170**

- **Legal considerations**

- **Privacy issues with uploading data to USPS**

- **Data being provided is similar or the same as what is currently visible in address window, is encrypted and only being sent to USPS**
    - **Data breach risk is limited i.e. encrypted file transfer**

**USPS Response:** The USPS proposed that the COM Tool would accept only encrypted files and that is still the case for Automated Option (or for 'manual' option). This is already a practice of PO!

- **Mailers agree Name(s), Address and Policy number is required on PS Form 3665 exactly as it appears in address block on mail piece**

**USPS Response:** No change required by USPS.

- **No change to what is provided in court to demonstrate compliance other than the PS Form 3665 replacing PS Form 3877 as required by USPS**

**USPS Response:** No additional change required by USPS. Affidavits will not be provided by USPS.

# Certificate of Mailing - Bulk Automated Recommendation

## **1. Up front user requirements for Bulk Mailings**

**NOTE: PS Form 3606D “does not provide evidence that a piece was mailed to a particular address”**

### **–Piece**

- Unique ID required on each piece
- Uniqueness definition same as full service;
  - Class, MID, Sequence #;
  - Accurate Routing ZIP is not required part of the unique piece ID but may be included
- Current USPS regulations remain; –All identical piece weight;
  - Fully paid postage affixed to each piece

**USPS Response:** The COM Tool concept would include capturing the unique IMb's (or IMpb's if parcels) for the identical weight mailpieces that are associated with the Certificate of Bulk Mailing Form. The COM Tool would transmit Form to PO!

## **2. Mail Preparer will upload Mail.dat or Mail.xml file to PO!**

- File must contain .pbc or .pbr records;**
- File will contain a unique COM sequence number for IMpb to each upload;**
- COM fee payable by Permit or CAPS account**

**USPS Response:** The mailer could upload mail.xml or mail.dat. files to PO! (PO! cannot accept SSF or .csv (comma separated values-flat files) or upload to the COM Tool. PO! would transmit data to the tool to create the barcoded COM form if not already in the COM Tool. COM Tool transmits form back to PO!

PO! would collect payment of fees through permit/CAPS following verification (see #3 on next slide).



### **3. USPS audit of content By Clerk**

- Clerk checks actual piece weight against eDoc, confirms correct amount of postage affixed to each piece**
- If required by USPS rules, scan IMb on sampled piece(s) with hand held scanner**
  - Confirm IMb part of uploaded eDoc
  - Perform other verifications as required by individual site mailing agreement
- When audit is complete, Clerk electronically signs acknowledgement form on computer**
  - PO! Automatically sends PDF to mail owner;**
    - Full PS Form 3606-D;**
    - Form has an electronic round stamp and clerk signature**
  - Form available on BCG for individual retrieval (up to 1 year)**

**USPS Response:** To clarify, the USPS proposal is only for the **PS Form 3606-D, Domestic Certificate of Bulk Mailing.**

1. After items in 1. and 2. occur (previous slides), acceptance site would complete weigh verification or sampling/scanning of the mailing which would be reconciled in PO!
2. PO! will collect payment of fees through permit/CAPS.
3. PO! will transmit completed COM data back to COM Tool
4. The COM Tool will generate the form with an electronic postmark/employee initials.
5. Mailer can print PS Form 3606-D and/or save it as a .pdf.
  - COM Tool will retain the form/data for 180 days (same retention periods as postage statements currently in PO!).

# Next Steps

- **Standard Operating Procedures will be issued by USPS to all field offices, BMEs and DMUs**
  - Target Date January 17, 2016
- **Communication Plan will be executed beginning January 2016**
- **COM Tool**
  - Still working to determine if a tool will be funded
- **Decision on Dual Stamper**



